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October 23, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: Application of Duke Energy Progress, LLC for Approval of Rider DSM/EE-11,
Decreasing Residential Rates and Increasing Non-Residential Rates

Docket Number 2019-262-E

Dear Ms. Boyd:

Please find attached for electronic filing the Petition to Intervene filed on behalf of the South Carolina Coastal Conservation League (CCL), South Carolina State Conference of the NAACP (SC NAACP), and Southern Alliance for Clean Energy (SACE) in the above-referenced matter. Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stinson W. Ferguson

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*Attorney for South Carolina Coastal
Conservation League, South Carolina State
Conference of the NAACP, and Southern
Alliance for Clean Energy*

Enclosures
SWF/ees
cc (w/encl.): Parties of Record

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-262-E

In the Matter of:

Application of Duke Energy Progress,
LLC for Approval of Rider DSM/EE-
11, Decreasing Residential Rates and
Increasing Non-Residential Rates

PETITION TO INTERVENE

The South Carolina State Conference of the NAACP, the South Carolina Coastal Conservation League, and Southern Alliance for Clean Energy (collectively, “Petitioners”) hereby petition the South Carolina Public Service Commission (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On September 24, 2019, Duke Energy Progress, LLC (“DEP” or “the Company”) filed an application for approval of its DSM and EE cost recovery and incentive rider for 2020 (“Rider 11”). The proposed Rider 11 consists of components calculated under DEP’s new cost recovery and incentive mechanism approved in Order No. 2015-596 in Docket No. 2015-163-E.

2. The South Carolina Conference of the NAACP (“SC NAACP”) is a nonpartisan, nonprofit civil rights organization founded in 1939, with its principal place of business located in Columbia, South Carolina. The SC NAACP is the leading civil rights organization in South Carolina and is made up of 54 active branches and councils/chapters with approximately 8,425 individual members throughout the state of South Carolina, including the DEP service area. Those SC NAACP members would be

subject to the direct impacts of DEP's proposed DSM/EE programs and rider. SC NAACP and its members have a direct and substantial interest in this proceeding. The SC NAACP's primary focus is the protection of the civil rights of all people; ensuring equity in the areas of education, healthcare access and environmental justice, criminal justice, voting rights, political engagement, and economic sustainability; and expanding youth and young adult engagement.

3. Southern Alliance for Clean Energy ("SACE") is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has members who receive electricity service from DEP and are subject to the impacts of DEP's proposed DSM/EE programs and rider. SACE and its members are interested in promoting greater reliance on demand side management and energy efficiency to meet South Carolina's energy needs. SACE and its members have a direct and substantial interest in this proceeding. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

4. The South Carolina Coastal Conservation League ("CCL") is a nonprofit corporation organized under the laws of the State of South Carolina. As an advocate for demand side management and energy efficiency, CCL and its members support the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from DEP and would be subject to the impacts of the Company's demand side management and energy efficiency ("DSM/EE") programs and rider. CCL and its

members have a direct and substantial interest in this proceeding. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29403.

5. Petitioners CCL and SACE participated actively in and were parties to the stipulations of settlement reached in Docket Nos. 2009-190-E, 2009-191-E, and also participated actively in past annual DSM/EE rider proceedings, Docket Nos. 2018-255-E, 2017-245-E, 2016-289-E, 2015-163-E, 2014-89-E, and 2013-76-E.

6. Petitioners seek to intervene in this proceeding in order to ensure that their members' interests in promoting energy savings through cost-effective DSM and EE are represented. Petitioners are also interested in ensuring that DEP's DSM and EE programs are delivering results, and that the costs and incentives to be recovered via the rider are based on measured and verified energy savings.

7. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this docket.

Respectfully submitted this 23 day of October, 2019.

s/ Stinson Woodward Ferguson

SC Bar No. 79871

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*Attorney for Petitioners South Carolina State Conference
of the NAACP, South Carolina Coastal Conservation
League, and Southern Alliance for Clean Energy*

CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the foregoing Petition to Intervene by electronic mail at the addresses set forth below:

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This the 23 day of October, 2019.

s/ Emily Selden